

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

-v.-

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: AUG 17 2007

: INDICTMENT

JENNIFER ROWE,
PAPE SECK,

Defendants.

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07 CRIM 771

COUNT ONE

The Grand Jury charges:

1. From in or about 2004, up to and including in or about December 2005, in the Southern District of New York and elsewhere, JENNIFER ROWE and PAPE SECK, the defendants, together with others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to commit offenses against the United States, to wit, to violate Section 1546 of Title 18 of the United States Code.

2. It was a part and an object of the conspiracy that JENNIFER ROWE and PAPE SECK, the defendants, and others known and unknown, unlawfully, willfully, and knowingly did forge, counterfeit, alter, and falsely make immigrant and non-immigrant visas, permits, and other documents prescribed by statute and regulation for entry into and as evidence of authorized stay and employment in the United States, and did utter, use, attempt to use, possess, obtain, accept, and receive such visas, permits,

and other documents prescribed by statute and regulation for entry into and as evidence of authorized stay and employment in the United States, knowing these documents to be forged, counterfeited, altered, and falsely made, and to have been procured by means of false claims and statements, and to have been otherwise procured by fraud and unlawfully obtained, in violation of Title 18, United States Code, Section 1546(a).

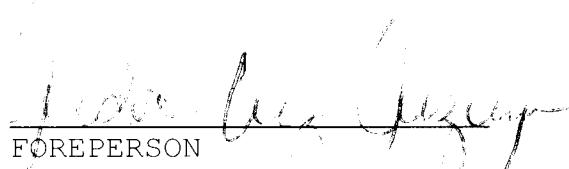
Overt Acts

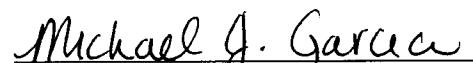
3. In furtherance of said conspiracy and to effect the illegal object thereof, JENNIFER ROWE and PAPE SECK, the defendants, and others known and unknown, committed the following overt acts, among others, in the Southern District of New York and elsewhere:

a. In or about January 2005, ROWE met with an individual and accepted payment in exchange for preparing the individual's Form I-687 and other immigration paperwork.

b. In or about January 2005, SECK spoke on the telephone with another individual about preparing the individual's Form I-687 and other immigration paperwork.

(Title 18, United States Code, Section 371.)


FOREPERSON


MICHAEL J. GARCIA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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INDICTMENT

07 Cr.

(18 U.S.C. § 371)

MICHAEL J. GARCIA
United States Attorney.

A TRUE BILL

Michael J. Garcia Foreperson.

8/17/07 TLC Post 11/1/87 indictment filed.

A/w ordered.

Assigned to Judge Crotty.

Peek, M.J.